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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

MONIQUE MURPHY, as an individual  
and on behalf of all others similarly  
situated,

Plaintiff,

vs.

HRB GREEN RESOURCES, LLC, a  
Delaware limited liability company; and  
DOES 1 through 50, inclusive,

Defendants.

Case No. 3:16-cv-04151-EDL

**PLAINTIFF'S NOTICE OF SUBMISSION OF  
NOTICE OF PAGA SETTLEMENT AND  
RELEASE IN SUPPORT OF MOTION TO  
APPROVE SETTLEMENT AGREEMENT  
PURSUANT TO THE PRIVATE ATTORNEY  
GENERAL ACT**

Date: May 14, 2019  
Time: 9:00 a.m.  
Courtroom: E  
Judge: Hon. Elizabeth D. Laporte

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15 Attorneys for Plaintiff

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that attached hereto as Exhibit "A" is the Notice of PAGA  
3 Settlement and Release which the Parties intend to send to employees along with their settlement  
4 checks pursuant to the Private Attorney General Act ("PAGA"). Plaintiff Monique Murphy  
5 ("Plaintiff") inadvertently did not attach the notice.  
6  
7

8 DATED: May 13, 2019

DIVERSITY LAW GROUP, P.C.

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10 By: /s/ Larry W. Lee  
11 Larry W. Lee  
12 Attorneys for Plaintiff  
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# EXHIBIT A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MONIQUE MURPHY, as an individual and on behalf  
of all others similarly situated,

Plaintiff,

v.

HRB GREEN RESOURCES, LLC, a Delaware  
limited liability company, and DOES 1 through 50,  
inclusive,

Defendants.

Case No. 16-CV-04151-EDL

**NOTICE OF PAGA SETTLEMENT AND  
RELEASE**

To [NAME]:

The enclosed check is your share of a court-approved representative action settlement between plaintiff Monique Murphy, a former associate, and defendant HRB Green Resources LLC (“HRB”). Ms. Murphy filed a lawsuit against HRB not only in her individual capacity but also as the representative of other current and former HRB associates, such as yourself. In that lawsuit, she asserted a claim against HRB under California Labor Code § 2698 *et seq.*, also known as the Private Attorneys General Act (“PAGA”), based on alleged violations of California wage and hour laws. HRB denies that it violated the law in any way, but has agreed to enter into a settlement with Ms. Murphy to avoid the cost and disruption of further litigation.

As a current or former associate employed by HRB in California who received either a paystub reflecting a payment of overtime in 2016 or an end-of-season true up payment during the time period from January 1, 2016 through December 31, 2018, you are covered by this settlement. Per the Court’s final judgment in this case, all people covered by this PAGA-only settlement have released any and all claims under PAGA predicated on a violation of California Labor Code §§ 201-203 that arose during the time period of January 1, 2016 through December 31, 2018 and/or any and all claims under PAGA predicated on a violation of California Labor Code § 226 that arose during the time period of January 1, 2016 through December 31, 2016. This means that you are not able to pursue or recover from a PAGA lawsuit against HRB based on such claims. Such claims are released by the Court’s final judgment regardless of whether you cash or deposit the enclosed check.

The payment you are receiving was calculated based on the number of calendar years during which you received a paystub reflecting the payment of overtime and/or the number of calendar years during which you received an end-of-season true up payment. Because this calculation was approved by the Court, the amount of your payment is final and cannot change. Please note that no taxes were withheld from this payment, so it will be your responsibility to pay any taxes resulting from this payment.

If you have any questions or would like more information about the settlement or this lawsuit, you may contact the Claims Administrator at [Claims Administrator], [Address], [Telephone Number]